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July 17, 1995

**RECEIVED** 

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Mr. William Caton Acting Secretary Federal Communications Commission 1919 M Street, N.W. Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION OFFICE OF SECRETARY

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Attn: International Bureau

Re: IC Docket No. 94-31, Preparations for the 1995 World Radiocommunication Conference

Dear Mr. Caton:

This letter is submitted on behalf of E-SAT, Inc., an applicant for MSS below 1 GHz. E-SAT, Inc. supports the July 6, 1995 submission of Leo One USA Corporation concerning the need for the U.S. to seek additional uplink spectrum for MSS below 1 GHz systems at WRC-95. E-SAT agrees that the market projections for MSS below 1 GHz service warrant at least 5 GHz of additional uplink spectrum. This is supported by the WRC-95 Conference Preparatory Meeting Report which states that 7-10 MHz of additional spectrum is needed in the near future.

E-SAT, Inc.'s own analysis supports the ability of MSS above 1 MHz to share spectrum with land mobile systems. The study conducted by LinCom Corporation and submitted by LEO One USA, substantiates the ability of FDMA/TDMA systems to operate compatibly with land mobile systems. Systems such as E-SAT, which will utilize a CDMA/TDMA scheme for uplink transmissions, can readily share with land mobile systems.

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<sup>&</sup>lt;sup>1</sup> Application File No. 24-SAT-P/LA-95.

## Leslie Taylor Associates - page 2

Consequently, E-SAT, Inc., urges the Commission, in addition to the 2 GHz identified in the Commission's WRC-95 Report, to propose the allocation of an additional 3 MHz, such as 456-459 MHz, for MSS below 1 GHz uplinks.<sup>2</sup>

E-SAT, Inc., respectfully requests the Commission to include this submission as a late-filed comment in the WRC-95 Docket No. IC 94-31.

Respectfully submitted,

Jolie a. Jazla Leslie A. Taylor

Counsel to E-SAT, Inc.

Attachment - Certificate of Service

<sup>&</sup>lt;sup>2</sup> <u>Preparation for International Telecommunication Union World Radiocommunication Conferences</u>, IC Docket No. 94-31, FCC 95-245, released June 15, 1995.

## Certificate of Service

I, Andrew Taylor, do hereby certify that copies of the foregoing "Supplemental Comments of E-SAT, Inc." were sent on this 17th day of July, 1995, by first-class mail, postage prepaid to the following persons.

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